

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 20-cr-10012-IT
	)	
PAUL BATEMAN,	)	
Defendant.	)	

MOTION TO FILE DISCOVERY RESPONSE UNDER SEAL

The United States of America, by and through the undersigned Assistant United States Attorneys, respectfully seeks leave to file its response to the defendant's Discovery Letter (provided to the government on February 2, 2021 and filed under seal on February 3, 2021) under seal. As reason therefor, the government states that the response contains reference to sensitive information that is protected from public disclosure pursuant to the Protective Order issued on February 25, 2020. The government's response to the Discovery Letter has already been provided to counsel for the defendant pursuant to the Protective Order.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By: /s/ Anne Paruti  
Anne Paruti  
Mackenzie Queenin  
Assistant U.S. Attorneys

Date: February 17, 2021

**CERTIFICATE OF SERVICE**

I, Anne Paruti, hereby certify that the foregoing was filed through the Electronic Court filing system and will be sent electronically to the registered participant as identified on the Notice of Electronic filing:

Dated: February 17, 2021

/s/ Anne Paruti  
Assistant United States Attorney